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8 Attorneys for Defendant
9 HAL ELTZROTH

10 BAYDELTA MARITIME, INC.,
11 Plaintiff,

12 vs.

13 HAL ELTZROTH,

14 Defendant.

15 ...and RELATED COUNTERCLAIM.

16 Case No. C-06-1114 MMC

17 STIPULATION TO EXTEND TIME TO
18 COMPLETE ENE AND [PROPOSED]
19 ORDER

20 WHEREAS, on May 1, 2006, pursuant to stipulation by the Parties, the Court ordered that
21 the Parties complete an Early Neutral Evaluation (“ENE”) by July 31;

22 WHEREAS, the Alternative Dispute Resolution Clerk appointed Marilyn Raia, Esq. as the
23 Early Neutral Evaluation Evaluator;

24 WHEREAS, on June 5, 2006, Defendant/Counterclaimant filed an amended Counterclaim
25 adding a new party to this action. The new party has not yet been served and has not appeared.

26 WHEREAS, Marilyn Raia, Esq. wrote to counsel for the Parties and suggested that the
27 Parties seek an order extending the time to complete the ENE. WHEREAS, BAYDELTA

1 MARITIME, INC. and HAL ELTZROTH agree that an extension of the July 31, 2006 deadline to
2 complete an Early Neutral Evaluation is appropriate;

3 WHEREFORE, IT IS HEREBY STIPULATED by and between BAYDELTA MARITIME,
4 INC. and HAL ELTZROTH that the deadline to complete an Early Neutral Evaluation in the above-
5 captioned action should be extended from July 31, 2006 to September 8, 2006.

6 SO STIPULATED:

7 Dated: June 16, 2006

SHEPPARD MULLIN RICHTER &
8 HAMPTON LLP

9

10 By: /s/ Amy B. Norris

11 Amy B. Norris

12 ATTORNEYS FOR PLAINTIFF
13 BAYDELTA MARITIME, INC.

14 Dated: June 16, 2006

15 VENARDI • ELAM LLP

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17 By: /s/Mark L. Venardi

18 Mark L. Venardi

19 ATTORNEY FOR
20 DEFENDANT/COUNTERCLAIMANT
HAL ELTZROTH

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2 IT IS HEREBY ORDERED that the deadline to complete an Early Neutral Evaluation
3 in the above-captioned action is extended from July 31, 2006 to September 8, 2006.
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5 SO ORDERED:
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7 Dated: June 19, 2006



8 Hon. Maxine Chesney
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11 United States District Judge
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